BDCP RDEIR/SDEIS Review Document Comment Form

Document: ***Administrative Draft—Sec 4-New alts 5.1.15*** ____

Comment Source: NMFS
Submittal Date: May 14, 2015

No.	Page	Line #	Comment	ICF Response
1	3	9-19	It is not accurate to state – no changes to D1641 Delta E/I standards. The proposed operations measure inflow below the new intakes while D1641 requires it to be measured at a location above the intakes. This should be clearly described and statements like this should be removed from the entire document.	
3	5	Table 4.1-5	The mitigation ratios described in these env. commitments have not been agreed to by the fisheries agencies and are still under discussion. It is ok to have them in as placeholder but it should be specified they are subject to revision.	
4	4	4.1.3.3	This section should discuss mitigation for the operation and maintenance of the facilities as well as for construction.	
5	7	10-28	The potential benefits of these two ec's remain uncertain at best. Is there any new info that can be provided to NMFS on the latest results from the last year of studies on the NPB? Line 12 should be edited to say "This action is *intended to* reduce *densities* of predatory fishes…"	
6	9	30-39	No specific changes in So Delta ops for this Alternative? So the SJ I/E ratio in the NMFS opinion would be followed instead of scenario 6? Seems like a strange change from 4A.	
7	10-13	General	Same issues apply to this Alt as above	
8	43	17-29	September is a month of great concern for WR alevins, yolk sac fry. Declines in flow during Aug-Sept and continuing small declines in October suggest adverse temp effects on spawning/egg incubation and Table 11.2.d-13 suggest >1300 more days exceeding 56F between July-Sept. This is an adverse effect on spawning.	
9	48	4-15	Good determination and summary of overall results. Though I didn't see the logic for this conclusion build up in the summaries after each model result was presented. It would be good to try and classify results of each model result (negative due to 3/5 months being …etc) as you lead toward the overall conclusion.	
10	Gene		Due to competing priorities within the 8 work days	

	ral		slotted to review this material NMFS did not have time to review spring and fall/late fall run, steelhead.	
11			The green sturgeon analysis for effects under Alt 2D is missing.	
12	175	17-24	This section states there is uncertainty regarding the mechanism between Delta outflow and sturgeon year class production. It also states that the uncertainty will be resolved through targeted studies before the intakes come on line. Pending the outcome of those studies, the outflow under Alt 2a will be "set" to not adversely affect sturgeon. Therefore the current analysis that shows Alt 2A will reduce what may be a significant outflow threshold by more than 50% is not adverse. Is this the proper way to assess proposed operations of Alt 2A? What if no definitive answer is produced before the intakes come online? Do we accept that Alt 2A operations are not adverse or do we "set" outflow to what historical data leads us to believe is an important threshold? The same logic on this assessment is in Alt 4A so would like clarification that this is an appropriate way to proceed and answers to what happens if no definitive answer is produced prior to intakes coming on line. It seems that the applicant would need this kind of information before proceeding to build the "optimal' amount of intakes and the outflow analysis was an attempt to inform this based current available data.	
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